

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustee of the WOODBRIDGE
LIQUIDATION TRUST,

Plaintiff,

v.

KENNETH HALBERT,

Defendant.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Adversary Proceeding No. 19-51027 (JKS)

NOTICE OF DEPOSITION OF DEFENDANT KENNETH HALBERT

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding by Rules 7026 and 7030 of the Federal Rules of Bankruptcy Procedure, counsel for plaintiff Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust, will take the deposition by oral examination of defendant Kenneth Halbert via remote videoconference technology on **Tuesday, October 18, 2022**, commencing at 8:30 a.m. (Pacific Time).

PLEASE TAKE FURTHER NOTICE that the deposition may continue for the maximum time permitted under applicable rules and may, for good cause, be extended. The

¹ The Remaining Debtors and the last four digits of their respective federal tax identification number are as follows: Woodbridge Group of Companies, LLC (3606) and Woodbridge Mortgage Investment Fund I, LLC (0172). The Remaining Debtors' mailing address is 201 N. Brand Blvd., Suite M, Glendale, California 91203.

deposition will be taken before a qualified notary public or some other officer authorized by law to administer oaths and will be recorded by stenographic, video, and audio means.

DATED: October 7, 2022 PACHULSKI STANG ZIEHL & JONES LLP
Wilmington, Delaware

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073)
Andrew W. Caine (CA Bar No. 110345)
Bradford J. Sandler (DE Bar No. 4142)
Jason S. Pomerantz (CA Bar No. 157216)
Colin R. Robinson (DE Bar No. 5524)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Tel.: (302) 652-4100
Fax: (302) 652-4400
Email: rpachulski@pszjlaw.com
acaine@pszjlaw.com
bsandler@pszjlaw.com
jspomerantz@pszjlaw.com
crobinson@pszjlaw.com

-and-

KTBS LAW LLP
f/k/a Klee, Tuchin, Bogdanoff & Stern LLP
Kenneth N. Klee (*pro hac vice*)
Michael L. Tuchin (*pro hac vice*)
David A. Fidler (*pro hac vice*)
Robert J. Pfister (*pro hac vice*)
1801 Century Park East, 26th Floor
Los Angeles, California 90067
Tel: (310) 407-4000
Fax: (310) 407-9090

Counsel for the Trustee